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November 3, 2021

BY ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. James David Williams et al; 16 Cr. 436 (KMW)

Dear Judge Wood:

I represent James David Williams in the above-referenced matter.

Mr. Williams appeared remotely on October 18, 2021, at a violation of supervised release hearing. He was arraigned on three specifications and pleaded not guilty. The Court released Mr. Williams pursuant to the following conditions: a \$500,000 bond, co-signed by two people, by October 25, 2021,¹ and travel restricted to the Central District of California. The Court adjourned the matter for another conference on November 18, 2021 at 11 a.m.

The purpose of this letter is to respectfully request a temporary modification of Mr. Williams' bail conditions. Mr. Williams lives in Southern California. Presently, his travel is restricted to the Central District of California. It is respectfully requested that his travel restrictions be extended such that he may travel with his wife, Nikki Williams, to visit their daughter, Windsor Williams in Tempe, Arizona this weekend. Ms. Windsor Williams is a freshman at Arizona State University. This weekend, it is Parents Weekend at Arizona State University and Mr. Williams, and his wife would very much like to spend time with their daughter during this special event. Additionally, they would also like to visit with their son, Carter Williams, who also lives in Tempe, Arizona. As noted, he is also a co-signer of Mr. Williams' bond.

His proposed travel is to leave Southern California by car on Friday, November 5, 2021 at 9 a.m. and return home on Sunday, November 7, 2021 by 11 a.m. While in

¹ Mr. Williams' wife, Nikki Williams and son, Carter Williams were approved and signed the bond on October 25, 2021.

Tempe, Mr. Williams and his wife will stay at the Tempe Missions Palms Hotel, located at 60 East 5th Street, Tempe, Arizona, 85281, and in close proximity to Arizona State University.

I have conferred with Probation Officer Alan Barahona of the Central District of California. He opposes this request as does the Government.

Respectfully submitted,

/s/

Anthony Cecutti

The Court denies these requests in view of the Government's contention that Mr. Williams poses a risk of flight.

Accepting arguendo Mr. Cecutti's representation that Mr. Williams's description of the requested travel is absolutely true, the Court is of the opinion that Mr. Williams's past behavior warrants the geographic restriction placed on him previously.

SO ORDERED: N.Y., N.Y. 11/4/21

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.